

JUROR # _____

-----X
UNITED STATES OF AMERICA :
 :
 :
 - v - :
 :
 KAREEM IBRAHIM :
-----X

JURY QUESTIONNAIRE
07-CR-543 (DLI)

HON. DORA L. IRIZARRY
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NY 11201

JURORS ARE INSTRUCTED TO CALL: 1-800-522-5100
ON **THURSDAY, APRIL 28TH AFTER 4:30 P.M.**
FOR FURTHER REPORTING INSTRUCTIONS.

IT IS **EXTREMELY** IMPORTANT THAT YOU KNOW THE
JUROR NUMBER WRITTEN ON THE TOP OF THIS FORM
WHEN YOU MAKE YOUR CALL.

THANK YOU.

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JUROR QUESTIONNAIRE

**THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED
ONLY TO THE APPROPRIATE COURT PERSONNEL
AS DIRECTED BY THE PRESIDING JUDGE**

Please print the following information in blue or black ink:

Name: _____

Home Address: _____

Home Phone: _____

Cellular Phone: _____

Job & Department: _____

Business Address: _____

Business Phone (Including Extensions): _____

Business Fax: _____

I hereby declare, under penalty of perjury, that the foregoing information, and all of the answers in this questionnaire, are true, correct, and complete to the best of my knowledge, and that I have answered all of the questions myself. I further certify that I have not discussed my answers with others or received assistance in completing this questionnaire.

Date: April __, 2011

SIGNATURE

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JUROR QUESTIONNAIRE

JUDGE'S PRELIMINARY INSTRUCTIONS TO PROSPECTIVE JURORS

Upon your oath or affirmation, you must give true and complete answers to **all** questions in this questionnaire, which is designed to assist the judge in quickly selecting a fair and impartial jury. We realize that the questionnaire is lengthy, but its use will shorten the jury selection process, and, thus, your cooperation is vitally important. These questions are not meant to pry unnecessarily about personal matters, but rather, will help evaluate your ability to serve as a fair and impartial juror in this case. Part of the selection process depends on your ability and promise to follow the law as it is explained by the judge. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

Please answer each question by placing an “X” next to the correct response or by providing the information requested. Please write only your **assigned juror number** in the space provided at the top of **each** page as indicated. Please answer **all** questions, writing as legibly as possible, and answering as accurately, completely, and as reasonably as you can. If a question does not apply to you, fill in the space with an “N/A” for “not applicable.” **Do not leave any answer blank.** If you require additional space for your responses or wish to make further comments regarding any of your answers, use the margins or the extra sheets at the end and indicate the question number to which you are responding. Remember, complete answers are more helpful than incomplete answers. Since we will be making copies of this questionnaire, **please do not write on the back of any page.**

The court instructs you not to discuss the questionnaire or your answers with your fellow jurors or anyone else. It is very important that the answers be yours and yours

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alone. Please answer as thoughtfully and candidly as possible. Your answers must be true and complete – they are the equivalent to statements under oath. This case involves sensitive issues about which we all have opinions and feelings. It is of the utmost importance that you answer all questions without regard to how you think anyone else would answer the same question or whether your answer is popular or “correct.” Remember, there are no “right” or “wrong” answers. Honest answers are always correct.

You may have heard or learned something about this case before coming to court today. You are instructed that you may not seek out any additional information concerning this case, the defendant, attorneys, or the court. You may not investigate or do any research concerning this case at any time by any means, including, but not limited to newspapers, magazines, or other print media, television, radio, and the Internet, regardless of how it may be accessed. The jury must decide the case based only on the evidence introduced in court and the court’s instructions on the law. Do not discuss the case with anyone, including your family, friends, co-workers and fellow jurors.

In many federal court cases, it is a common practice to keep the names and identities of the jurors in confidence. This is not unusual in any way. Experience has shown that, in a case like this, it is wise to take such steps as are deemed necessary to make certain that the juror’s right to privacy is respected. Accordingly, we are following this procedure. The media and members of the public will be curious about the identity of the jurors, the witnesses, the lawyers, and all other participants, and may seek to inquire into their personal affairs. Anonymity will assure that the jury will not be exposed to such prying and to opinions, commentaries, and inquiries that might impair its ability to decide the case solely upon the evidence presented in

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court and upon the law as the court instructs. It is important to insure that the jury will in no way be influenced by the public, by the members of the media, and their articles and reports. The court emphasizes that it is taking these measures to protect your rights of privacy and to assist you in discharging your responsibility as jurors independently, fairly and impartially. It will also permit the media complete freedom of coverage of this trial.

To insure that your rights of privacy will be respected, only the second page of the attached questionnaire asks you to state your name and other identifying information. That page will be detached from the questionnaire when you have completed it and will be locked securely in the office of the Clerk of the Court to be disclosed only to appropriate court personnel as the judge directs. It will not be available to anyone, including the prosecutors, the defendant, and his attorneys. On the remaining pages of the questionnaire, you are instructed not to give names or addresses or any information that will permit anyone, even the judge, to identify you. **However, you must be sure to write the Juror Number assigned to you at the top of each page in the space provided.**

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SUMMARY OF THE CASE

In this criminal case, *United States v. Kareem Ibrahim*, the defendant is charged, by way of an indictment issued by a grand jury, with conspiracies to: 1) attack a public transportation system, specifically JFK Airport, 2) damage and destroy JFK Airport by means of fire and explosives, 3) attack aircraft and aircraft material, 4) destroy international airport facilities, specifically JFK Airport, and 5) attack a mass transportation facility, specifically fuel tanks, pipelines and buildings at JFK Airport. These acts allegedly occurred from January 1, 2006 through June 2, 2007. This is just a summary of the charges to give you some background on the case. The court will instruct the jury as to the elements of the crimes charged and the applicable law at a more appropriate time during trial.

The indictment is simply the means by which the government gives the defendant notice of the charges against him and brings him before the court. The indictment is merely an accusation, and nothing more. It is not evidence and is not to be considered by the jury in arriving at a verdict. In response to the indictment, the defendant pled “not guilty.” He is presumed to be innocent until his guilt has been proven by the government beyond a reasonable doubt and that presumption alone, unless overcome, is sufficient to acquit him. The defendant is presumed innocent unless the jury unanimously decides that the government has proven him guilty beyond a reasonable doubt. If the government does not meet its burden, the jury must find the defendant not guilty.

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BACKGROUND QUESTIONS

1. What is your age: _____ Are you: ☐ Male ☐ Female

2. What city, state and country were you born and raised in?

Born: _____ Raised: _____

(a) If born outside the United States, are you a naturalized citizen?
☐ Yes ☐ No

(b) Where were your parents born?

Father: _____ Mother: _____

(c) Did you, your parents, spouse, or significant other (if applicable) immigrate to the United States?
☐ Yes ☐ No

If yes, please indicate who immigrated to the United States, when and from where
(*please do not list the person's name*):

3. Where do you currently live?

County (e.g., Brooklyn, Queens, Suffolk, Nassau, Staten Island): _____

City/town (e.g., Dix Hills, Hempstead, East Meadow, etc.): _____

Neighborhood (e.g. Canarsie, Jackson Heights, Stapleton, etc.): _____

(a) How long have you lived at your present address? _____

(b) Who do you live with? _____

(c) In what other areas, states, cities, or neighborhoods have you lived in the past 10 years?

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4. What is your race and/or your ethnic background and that of your spouse, domestic partner or roommate (if applicable):

Yours: _____ Spouse/Partner/Roommate: _____

- (a) Have you ever felt discriminated against on the basis of your race/ ethnicity?

☐ Yes ☐ No

If yes, please explain: _____

5. What is your marital status (check all that apply):

☐ Single ☐ Single, living with another person as a couple
☐ Divorced / Separated ☐ Single, living with a roommate(s)
☐ Married _____ years ☐ Widowed

6. Do you have any children, step children or grandchildren? ☐ Yes ☐ No

If 'yes,' please indicate the following (*please do not list the person's name*):

Age	M/F	Highest Education	Current Occupation	Lives with you?

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7. What is the highest level of education you have completed?

- | | |
|---|--|
| <input type="checkbox"/> less than high school (grade _____) | <input type="checkbox"/> four-year college degree |
| <input type="checkbox"/> high school/ GED degree | <input type="checkbox"/> post college graduate studies |
| <input type="checkbox"/> some community/ technical/ business school | <input type="checkbox"/> graduate school degree |
| <input type="checkbox"/> two-year college degree | <input type="checkbox"/> other: _____ |

(a) Please list your major areas of study or area of concentration and any degrees or certificates, licenses, etc. that you have received.

8. If you are married or living with someone, what is that person's highest level of education and area of study:

9. Employment Status: Are you currently? (check all that apply)

- | | | | |
|-------------|------------------------------------|---|---|
| Employed: | <input type="checkbox"/> full time | <input type="checkbox"/> part-time | <input type="checkbox"/> have more than one job |
| Unemployed: | <input type="checkbox"/> laid off | <input type="checkbox"/> looking for work | <input type="checkbox"/> not looking for work |
| Other: | <input type="checkbox"/> homemaker | <input type="checkbox"/> retired | <input type="checkbox"/> disabled |
| Student: | <input type="checkbox"/> full time | <input type="checkbox"/> part time | Studying: _____ |

10. What is your current occupation or most recent occupation, in other words, what type of work do you do and, if not currently working, what type of work were you doing previously? *Please do not list the employer.*

(a) What is your current job title and duties? _____

(b) How long have you been in your present job? _____

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(c) Are you self-employed or do you work for others? _____

If self-employed, what type of business is it? _____

(d) Check the following category that best describes your employer?

- | | |
|---|---|
| <input type="checkbox"/> Private, for profit organization | <input type="checkbox"/> State government agency |
| <input type="checkbox"/> Private, not for profit organization | <input type="checkbox"/> County government agency |
| <input type="checkbox"/> Federal government agency | <input type="checkbox"/> City or local government |
| <input type="checkbox"/> Other: _____ | |

(e) Have you ever supervised others? ☐ Yes ☐ No

If yes, please describe what supervisory or management positions you have held, the type of supervising and the number of people supervised.

(f) Have you ever owned your own business? ☐ Yes ☐ No

If yes, what type of business was it? _____

11. Please describe your occupations during the previous 10 years. If you have not worked in the last 10 years, please describe your most recent job. *Please do not name the employer.*

Dates Worked	Title	Type of Work	Duties

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12. If you are married or living with someone, what is that person's employment status and what type of work does he or she do (if not working now, please indicate any prior work)? *Please do not name the employer.*

13. Have you, or a close family member, or close friend, ever served in the military, including the reserves, National Guard or ROTC? *(Please do not list names)*

[] Yes [] No

Person's Relationship to You	Branch	Rank	Location	Duties	Dates of Service	Type of Discharge?

- (a) Have you, a close family member or close friend, ever served in a combat or military zone whether in Iraq, Afghanistan or elsewhere? [] Yes [] No

If yes, do you know anyone who was injured or killed while serving? [] Yes [] No

What was that person's relationship to you (if any)? _____

- (b) Did you ever serve in the Military Police or on a Court Martial? [] Yes [] No

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14. Have you, or a close family member, or close friend, ever been a civilian military employee or worked for a company whose primary business was as a government, defense or military contractor or vendor?

[] Yes [] No

If 'yes,' please explain: _____

15. Have you, or anyone close to you, ever had any education or training in the following areas? (please check all that apply)

Law / Legal Field	[] myself [] family/friend
Criminal Justice / Law Enforcement	[] myself [] family/friend
Security / Intelligence	[] myself [] family/friend
Private Investigations	[] myself [] family/friend
Corrections / Jails / Prisons	[] myself [] family/friend
Firearms / Explosives	[] myself [] family/friend
Firefighting, Rescue Squad or EMT	[] myself [] family/friend
Engineering	[] myself [] family/friend
Political Science / Foreign Affairs	[] myself [] family/friend
Religion or Philosophy	[] myself [] family/friend
Mass Transportation	[] myself [] family/friend
Transporting / Maintaining Gas Pipelines	[] myself [] family/friend
Aircraft / Airline Industry / Aviation	[] myself [] family/friend
Counseling, Psychology, Psychiatry, Mental Health or Social Services	[] myself [] family/friend

- (a) If you answered 'yes' to any of the above, please state the nature of the training and, if other than yourself, please state the person(s) relationship to you:

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16. Have you or any of your relatives or close friends ever worked at John F. Kennedy International Airport or any other Airport?

[] Yes [] No

If you answered 'yes,' for each person state what type of work the person performed, at what airport and the person's relationship to you.

- (a) Is there anything about that employment that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

17. Would the frequency of any travel in or out of JFK Airport by you or any relatives or close friends affect your ability to be fair and impartial in this case?

[] Yes [] No

If 'yes,' please explain: _____

18. (a) How often do you currently attend religious services?

[] Regularly [] Occasionally [] Seldom [] Never

- (b) Growing up, how often did you attend religious services?

[] Regularly [] Occasionally [] Seldom [] Never

- (c) Have you or anyone in your family ever studied for or served in any position of responsibility in your church, temple, mosque or other religious organization?

[] Yes [] No

If 'yes,' please explain: _____

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21. (a) Do you believe that Islam endorses the use of violence?
☐ Yes ☐ No

(b) If yes, do you believe Islam endorses violence to a greater, lesser, or the same extent than other major religions?
☐ Greater extent ☐ Lesser extent ☐ Same extent

(c) Would your views affect your ability to be fair and impartial in this case?
☐ Yes ☐ No

If 'yes,' please explain: _____

22. The defendant is charged with conspiring to commit a terrorist attack at John F. Kennedy International Airport. Is there anything about the nature of these charges that would interfere with your ability to decide, based solely on the evidence, whether the government has proven the defendant guilty beyond a reasonable doubt?
☐ Yes ☐ No

If 'yes,' please explain: _____

23. Do you closely follow media reports relating to terrorist plots or past or pending criminal prosecutions of people charged with committing terrorist acts or any other terrorism related cases or topics?
☐ Yes ☐ No

If 'yes,' please explain: _____

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24. Have you ever written to any elected or appointed government official, newspaper or magazine, or called in to a television or radio program or written to any internet chat room or blog to express your opinion about Islam, immigration, terrorism, or the U.S. efforts to combat terrorism?

[] Yes [] No

If 'yes,' please indicate what opinions you expressed and over what media:

25. The proceedings in this Court will be conducted pursuant to the Constitution and laws of the United States. Individuals charged with terrorist acts against the United States are entitled to a fair and impartial jury trial. Will you be able to follow this rule of law?

[] Yes [] No

If 'no,' please explain: _____

26. Is there any racial or ethnic group that you do not feel comfortable being around?

[] Yes [] No

If 'yes,' please explain: _____

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HOBBIES AND ACTIVITIES

27. What community, civic, social, union, professional, fraternal, political, religious or recreational organizations do you belong to (e.g., PTA, Kiwanis, American Legion, NRA, NEA, Knights of Columbus, etc.)?

(a) Have you held any offices or positions of leadership? ☐ Yes ☐ No

If yes, please describe: _____

(b) What community, civic, social, union, professional, fraternal, political or religious organizations does your spouse or significant other belong to and what leadership positions, if any, have been held?

28. What are your hobbies / interests? What do you like to do in your spare time?

29. What television shows do you watch most often? _____

30. What newspapers do you read most often? _____

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31. What magazines or journals do you read most often? _____

32. What kind of books do you read most often? _____

33. What radio programs do you listen to most often? _____

34. What television news programs, radio programs, or internet websites do you watch, listen to, or visit on a regular basis?

35. Have you ever called in to a talk show, written a letter to the editor or participated in any web-blogs or chat rooms on the internet?
[] talk show caller [] editorial [] blog/chat room [] No
What topics do you usually address: _____

36. Have you, or anyone close to you, ever been a member of, or otherwise involved with, any group that: (check all that apply)

- [] takes a position on social or legal issues? (e.g., gun control/right to bear arms, health care, abortion, tax policy, etc.)
- [] focuses on crime prevention (e.g., neighborhood watch, crime stoppers, etc.)
- [] focuses on victims' rights (e.g., shelters or crisis centers, etc.)

If any, please indicate who was involved and the name(s) of the organization(s):

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37. How often do you seek out positions of leadership at work or with other group activities:

☐ always ☐ often ☐ sometimes ☐ seldom ☐ never

38. What is the most important issue we face today?

At the national level: _____

At the local level: _____

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LEGAL EXPERIENCE

39. Have you ever served as a juror?

☐ Yes, at trial ☐ Yes, on a grand jury ☐ No

(a) Please complete for each case on which you have served: *(Please do not state what verdict, if any, you reached in any case).*

Year	Civil, Criminal or Grand Jury	State or Federal	Nature of the case	Reach a Verdict? (Yes or No Only)	Were you Foreperson? (Yes or No Only)	Positive or Negative Experience

(b) Is there anything about your experience as a juror that would make you not want to serve again, or that affected your opinion about the jury system? ☐ Yes ☐ No

If yes, please explain: _____

(c) Is there anything about your experience as a juror that would make it difficult for you to sit as a fair and impartial juror in this case? ☐ Yes ☐ No

If yes, please explain: _____

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40. Have you, or anyone close to you, ever been the victim of or witness to a crime, whether or not that crime was reported to law enforcement?

[] Yes [] No

(a) Please complete for each incident, but do not include the person's name:

Person's relation to you	Victim/Witness	Type of Crime	Reported: Yes or No	Testify: Yes or No	Outcome

- (b) What are your opinions or attitudes toward law enforcement and / or the criminal justice system as a result of your experience?

- (c) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case? [] Yes [] No

If 'yes,' please explain: _____

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41. Have you, or anyone close to you, ever been involved in or the target of a criminal investigation or charged with a crime?

[] Yes [] No

Person's relation to you	Nature of Accusations / Target of or witness in Investigation	Charges	Outcome

- (a) Do you feel the individual investigated or charged was treated fairly by the criminal justice system? [] Yes [] No

Please explain: _____

- (b) What are your opinions or attitudes toward the criminal justice system as a result of the experience?

- (c) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case? [] Yes [] No

If 'yes,' please explain: _____

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42. Have you ever appeared or testified in any legal proceeding or investigation for any reason, whether as a plaintiff, defendant, victim, or witness?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

43. Have you ever been questioned or subpoenaed in any matter by the New York City Police Department, any state or local law enforcement agency, the Department of Justice or any United States investigative agency (e.g., the FBI, DEA, IRS, Customs Service, etc.)?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Do you feel that you were treated fairly in connection with this matter?

[] Yes [] No

If not, please explain: _____

- (b) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

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44. Are you, or anyone close to you, including family and friends, now under subpoena to testify in any criminal case?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

45. To your knowledge, have you, a family member, or a close friend ever been the subject of surveillance (visual, photographic, or electronic) by law enforcement or had a car or home searched by law enforcement?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

46. Have you, or anyone close to you, ever been involved in any legal action or dispute with any federal, state, or local government body?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

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47. Have you, a family member, or close friend ever worked in any aspect of the legal field as a lawyer, legal secretary, paralegal, investigator, law clerk, judge, court employee, etc.?

[] Yes [] No

If 'yes,' please explain:

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If yes, please explain: _____

48. Have you, a family member, or close friend ever worked as, or for, a criminal defense attorney, public defender office, private investigator, or private security firm?

[] Yes [] No

If 'yes,' please explain:

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

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49. Have you, a family member, or close friend ever worked for the court system or any correctional institution, jail or penitentiary whether local, state or federal?

[] Yes [] No

If 'yes,' please explain:

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

50. Have you, or anyone close to you, ever applied or worked for, or volunteered in, or otherwise affiliated with any local state or federal law enforcement (e.g. Police, Sheriff, DA's Office, U.S. Attorney's Office, Department of Corrections, FBI, DEA, U.S. Marshal Service, Homeland Security, IRS, etc.)?

[] Yes [] No

If 'yes,' please indicate the relationship of the person, describe the job and the law enforcement agency name:

- (a) Is there anything about this that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain: _____

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OTHER EXPERIENCES AND BELIEFS

51. Without revealing the names of these individuals, do you personally know anyone who was killed or injured in any terrorist attack, including the September 11, 2001 attacks on the World Trade Center, the Pentagon, the downed flight in Pennsylvania, or related to Oklahoma City, USS Cole, U.S. Embassies bombings or any other terrorist attack domestic or abroad?

[] Yes [] No

If 'yes,' please explain: _____

52. Have you, family members or close friends ever assisted or participated, in any way, in rescue or relief efforts, advocacy efforts or any other support for victims of any terrorist attack occurring in the United States or abroad?

[] Yes [] No

If 'yes,' please explain: _____

53. Have you, a family member, or a close friend, ever been affected by a terrorist act or threat?

[] Yes [] No

If 'yes,' please explain: _____

54. How concerned are you that terrorists will commit acts of violence near where you and your family live or work?

[] very concerned [] somewhat concerned [] not concerned

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55. Have you ever heard of Jamaat Al Muslimeen, also known as JAM?
[] Yes [] No

If 'yes,' please describe what you have heard: _____

- (a) Is there anything about this knowledge that would make it difficult for you to sit as a fair and impartial juror in this case? [] Yes [] No

If 'yes,' please explain: _____

56. Have you ever heard of the Joint Terrorism Task Force, also known as JTTF?
[] Yes [] No

If 'yes,' please describe what you know about this task force: _____

57. Have you, a family member or close friend ever visited, lived, studied or worked in the Middle East?
[] Yes [] No

If 'yes,' please list the countries they visited, lived, studied or worked in and the purpose of their time in the Middle East:

58. Have you, a family member or close friend ever studied about, visited, lived or worked in Guyana or Trinidad & Tobago?
[] Yes [] No

If 'yes,' please explain: _____

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- (a) Have you formed any impressions or opinions about Guyana or Trinidad & Tobago, the people or their governments? ☐ Yes ☐ No

If 'yes,' please explain: _____

59. The defendant in this case is an Afro-Caribbean Muslim man from Trinidad & Tobago. Is there anything about your views about Afro-Caribbean Muslims or people from Trinidad & Tobago that would affect your ability to be fair and impartial?

☐ Yes ☐ No

If 'yes,' please explain: _____

60. The defendant in this case is a Muslim spiritual guide. Is there anything about your views about Muslims or Muslim spiritual guides that would affect your ability to be fair and impartial?

☐ Yes ☐ No

If 'yes,' please explain: _____

61. Do you have any feelings about African Americans, Afro-Caribbeans, Arabs, Muslims, or the religion of Islam that would make it difficult for you to listen to evidence and decide a case with an open mind?

☐ Yes ☐ No

If 'yes,' please explain: _____

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CONTACT WITH COURT AND PARTIES

62. Please indicate if you, or any of your relatives or friends, knows or has a connection to, or has read or heard anything about any of the following people, or any of their relatives or friends:

(a) The presiding U.S. District Court Judge, Hon. Dora L. Irizarry [] Yes [] No
Any of the following members of her staff:

Adam Rodriguez [] Yes [] No

Maya Krugman [] Yes [] No

Aleah Borghard [] Yes [] No

Ledra Horowitz [] Yes [] No

Christy Carosella [] Yes [] No

(b) Anyone who works in this Federal Courthouse [] Yes [] No

(c) United States Attorney Loretta Lynch [] Yes [] No

(d) Anyone connected to the Office of the U.S. Attorney [] Yes [] No

(e) Assistant U.S. Attorneys:

Marshall Miller [] Yes [] No

Berit Berger [] Yes [] No

Zainab Ahmad [] Yes [] No

(f) Law Enforcement Officers:

Robert Addonizio, Kings Co. District Attorney's Office [] Yes [] No

John Darino, New York City Police Department [] Yes [] No

Ken Dibella, Special Agent, FBI [] Yes [] No

Robert Losada, Investigator, U.S. Attorney's Office [] Yes [] No

Michael Zeller, Investigator, U.S. Attorney's Office [] Yes [] No

(g) Defense Attorneys and Staff:

Michael Hueston [] Yes [] No

Zoe Dolan [] Yes [] No

Karloff C. Commissiong [] Yes [] No

Andrew Patel [] Yes [] No

If 'yes' to any of the above, please explain: _____

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63. (a) Do you, or any close friend or family member, know or have any connection to the defendant Kareem Ibrahim or his relatives or friends?

[] Yes [] No

If 'yes,' please tell us about any connection: _____

- (b) Do you, or any close friend or family member, know or have any connection to Russell Defreitas, Abdul Kadir, Abdel Nur, or their relatives or friends?

[] Yes [] No

If 'yes,' please tell us about any connection: _____

64. At any time, have you read any articles or internet blogs, seen any news programs, talked about with friends, co-workers or family members or overheard discussions regarding the defendant or the alleged conspiracy to commit an attack at JFK International Airport?

[] Yes [] No

If 'yes,' please indicate what you read, watched or heard: _____

- (a) What stands out most in your mind about what you have read, seen or heard about this case?

- (b) Please also indicate the source of your information (e.g., newspaper, television, radio, magazines, internet, friends, word of mouth, etc.):

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65. Have you formed any opinions about this case based on anything you have read, seen or heard in the media?

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JUROR # _____

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WITNESSES, EVIDENCE AND LEGAL PRINCIPLES

66. Some witnesses in this case will be law enforcement officers.

(a) Do you have any strong feelings, impressions, or opinions that would prevent you from evaluating the testimony of a law enforcement officer fairly and impartially?

[] Yes [] No

If 'yes,' please explain: _____

(b) The fact that a witness is employed by the government or acts in a law enforcement capacity does not mean that his or her testimony is deserving of more or less consideration or greater or lesser weight than that of an ordinary witness. Will you be able to follow the Court's instructions in this regard?

[] Yes [] No

If 'no,' please explain: _____

67. The evidence in this case may include testimony provided, or evidence obtained, by individuals, working with the government in exchange for payment or other benefits. Similarly, the evidence may include testimony provided, or evidence obtained, by individuals who entered into cooperation agreements with the government, whose cooperation the government promised to bring to the attention of the individuals' sentencing court(s). The government is permitted to enter into such agreements.

Do you have any views regarding the use of such evidence that will keep you from fairly evaluating whether to believe these individuals?

[] Yes [] No

If 'yes,' please explain: _____

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68. You may hear evidence at trial of the following:

- (a) Conversations and meetings recorded secretly at the direction of law enforcement agents during this investigation;
- (b) Visual, photographic and video surveillance conducted secretly by law enforcement agents during this investigation;
- (c) Searches of homes, bags and computers, conducted by law enforcement agents during this investigation; and
- (d) Post-arrest statements or confessions.

Evidence is admitted at trial only when the court determines that it is consistent with our laws. Do you have any feelings about such evidence, if admitted, that would make it difficult for you to consider the evidence fairly?

[] Yes [] No

If 'yes,' please explain: _____

69. The indictment that was filed in this case is the means by which the government gives the defendant notice of the charges against him and brings him before the court. The indictment is an accusation, and nothing more. The indictment is not evidence and the jury must not give it any weight in arriving at its verdict.

Will you be able to follow this rule of law?

[] Yes [] No

If 'no,' please explain: _____

(a) Do you believe that if a defendant is arrested or indicted, he or she must be guilty?

[] Yes [] No

If 'yes,' please explain: _____

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70. The defendant, in response to the indictment, pled “not guilty.” He is presumed to be innocent unless the jury unanimously decides that the government has proven his guilt beyond a reasonable doubt. This presumption of innocence alone, unless overcome, is sufficient to acquit him.

Will you be able to follow this rule of law?

[] Yes [] No

If ‘no,’ please explain: _____

71. As the law presumes the defendant to be innocent, the burden of proving his guilt beyond a reasonable doubt rests entirely on the government throughout the trial and it never shifts to the defendant. The defendant never has the burden of proving his innocence, and the defendant never has to present any evidence of innocence at all.

Will you be able to follow this rule of law?

[] Yes [] No

If ‘no,’ please explain: _____

72. The defendant has the constitutional right to remain silent and not testify at his trial. If the defendant does not testify, the jury must not draw any inference of guilt from his silence or hold it against him in any way during deliberations. The jury may not speculate as to why the defendant did not testify or attach any significance whatsoever to that fact.

Will you be able to follow this rule of law?

[] Yes [] No

If ‘no,’ please explain: _____

73. Should the defendant decide to testify and/or present evidence on his own behalf, the fact that he did so does not shift the burden of proof to the defendant. It remains with the government at all times.

Will you be able to follow this rule of law?

[] Yes [] No

If ‘no,’ please explain: _____

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74. Can you accept that the defendant is at this moment presumed to be innocent of any and all crimes charged in this indictment and that he is presumed to be innocent of these charges throughout the course of this trial?

[] Yes [] No

If 'no,' please explain: _____

75. At this point in time, do you have an opinion about whether the defendant is guilty of the crimes charged?

[] Yes [] No

If 'yes,' what is your opinion? _____

76. A defendant who is not a citizen of the United States is entitled to the same rights and consideration at trial as a citizen of the United States.

Will you be able to accept and follow this rule of law? [] Yes [] No

If 'no,' please explain: _____

77. You may hear testimony from or about the people listed on Attachment A during the trial. Please turn to Attachment A at the end of this packet, and circle the name of any person or place that you know or have any connection with.

Have you read or heard about someone on the list or any of the places mentioned?

[] Yes [] No

If 'yes,' please explain and indicate the name of the person:

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CONCLUDING QUESTIONS

78. Do you have any religious, philosophical, moral or other belief that might make you unable to render a verdict for reasons unrelated to the law and evidence?

[] Yes [] No

If 'yes,' please explain: _____

79. The jurors are the sole judges of the facts. However, the jury must accept and follow the principles of law as instructed by the judge. The jury may not follow some rules and ignore others. Even if the jury disagrees or dislikes the rules of law or does not understand the reasons for some of the rules, it is their duty to follow them. Do you have any personal beliefs that would make it difficult to follow the court's legal instructions, whatever they may be?

[] Yes [] No

If 'yes,' please explain: _____

80. The question of possible punishment of the defendant is of no concern to the jury and, pursuant to your oath as jurors, you cannot allow a consideration of the punishment that may be imposed upon the defendant, if he is convicted, to enter into or influence your deliberations in any sense or manner. The duty of imposing sentence rests exclusively upon the court. Will you be able to follow this rule without any difficulty?

[] Yes [] No

If 'no,' please explain: _____

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81. Under the law, emotions such as sympathy, bias and prejudice must not enter into the deliberations of the jurors as to whether the guilt of the defendant has been proven beyond a reasonable doubt. Will you be able to follow this rule without any difficulty?

[] Yes [] No

If 'no,' please explain: _____

82. As a potential juror in this case, you must avoid reading, viewing or listening to any and all media coverage in any form. You may not use the internet, by any electronic means, for any purpose, including research, as to any aspect of this case. In other words, you are forbidden from reading any magazine, newspaper, or any printed articles about this case, Googling this case or from emailing, instant messaging, blogging/tweeting about it or talking about it with anyone by computer, cell phone, or any other electronic device. Do you have any reservations or concerns about your ability or willingness to follow this instruction?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Will you immediately inform the Court if you are exposed to any such coverage, or make any postings whether accidentally or otherwise?

[] Yes [] No

83. The Court will instruct you not to discuss the case with anyone, except with your fellow jurors in the jury room after the judge directs you to begin your deliberations at the end of the case. Will you have any difficulty following the Court's instructions?

[] Yes [] No

If 'yes,' please explain: _____

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84. If you were chosen to serve as a juror on this case, would you be influenced in any way by the feelings or opinions of family, friends, or co-workers?

[] Yes [] No

If 'yes,' please explain: _____

- (a) Would you feel pressure to explain your vote to family, friends, or co-workers?

[] Yes [] No

85. Is there anything about the nature of the charges, or the facts of the case, as they have been explained to you thus far that cause you to doubt your ability to be fair and impartial?

[] Yes [] No

If 'yes,' please explain: _____

86. Is there any other matter that you should bring to the Court's attention that may have any bearing on your qualifications as a juror or may affect your ability to render a fair and impartial verdict based solely on the evidence and the Court's instructions on the law?

[] Yes [] No

If 'yes,' please explain: _____

JUROR # _____

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SCHEDULING AND HARDSHIP INFORMATION

Jury selection will begin on May 2, 2011. The jury selection process will last approximately one to two weeks and the trial will commence immediately afterward. Trial usually will be in session 4 days per week from 9:30 a.m. to approximately 5:00 p.m. There may be some days when the trial may begin before 9:30 a.m. and/or may go to 6:00 or 6:30 p.m. There may be some court-scheduled breaks. It is expected that the trial will last 3 to 5 weeks. To be on the safe side, we are requiring that the jurors who serve on this case be available through June 17, 2011.

If you are selected as a juror, you will be required to be present for the taking of all testimony for as long as the case lasts. There are no plans to sequester the jury during the trial, which means you will go home every day after court.

The court views jury service in a federal criminal trial to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardships of jury service will not be sufficient to excuse a prospective juror.

Please complete the following:

1. Do you have an unusual financial hardship or other serious problem that would prevent you from serving as a juror in this case?

[] Yes [] No

If 'yes,' please explain briefly the nature of the hardship: _____

2. Do you have any difficulty speaking, reading or understanding English? [] Yes [] No

If yes, please explain: _____

What other languages do you read or understand? _____

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3. Do you have any physical problem (for example, sight, hearing, inability to sit for long periods of time) or emotional problem that would interfere with your ability to serve?
[] Yes [] No

If 'yes,' please describe: _____

4. If you currently visit with a doctor or other medical professional on a regular basis, would those visits interfere with your ability to serve?
[] Yes [] No

If 'yes,' please briefly describe how often these visits occur and why they would interfere with your ability to serve:

5. Are you taking any medication that could affect your ability to serve as a juror?
[] Yes [] No

If 'yes,' please explain: _____

6. Do you have any dietary or physical restrictions that need to be accommodated?
[] Yes [] No

If 'yes,' please explain: _____

7. Is there any reason why you think you cannot serve on the jury?

JUROR # _____

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Additional Pages to Complete Responses to any Question

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

JUROR # _____

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Additional Pages to Complete Responses to any Question

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for handwriting practice or general writing. There are no margins, text, or other markings on the page.